

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SACHA BOTBOL, et al.,

Plaintiffs,

-against-

THE CITY OF NEW YORK, et al.,

Defendants.

**PLAINTIFFS'
RESPONSE TO
DEFENDANTS'
LOCAL CIVIL RULE
56.1 STATEMENT OF
UNDISPUTED FACTS**

05 Civ. 1572 (RJS) (JCF)

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Pursuant to Rule 56.1 of the Local Rules of this Court, plaintiffs hereby respond to defendants' Local Rule 56.1 Statement by adopting and incorporating by reference the responses (including all admissions and denials) and additional undisputed facts of the plaintiffs in each and every other consolidated RNC case including, but not limited to, *McNamara v. City of New York*, 04 Civ. 9216; *Schiller v. City of New York*, 04 Civ. 7922; and *Abdell v. City of New York*, 05 Civ. 8453. Plaintiffs also incorporate their Local Civil Rule 56.1 Statement of Undisputed Facts submitted in support of plaintiffs' motion for summary judgment and the respective Rule 56.1 Statements of Undisputed Material Facts submitted by the collective RNC Plaintiffs on October 3, 2011.

Dated: New York, New York
November 3, 2011

_____/s_____
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